The Honorable Judge Lasnik

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> STIPULATION AND PROPOSED ORDER FOR EXTENSION OF PRE-TRIAL DEADLINES 17-CV-416RSL - 1

IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

Plaintiff,

UNITED STATES OF AMERICA,

WILLIAM BARRY, PhD.

VS.

Defendant.

NO. 17-CV-0416RSL

STIPULATION AND PROPOSED ORDER FOR EXTENSION OF DISCOVERY **DEADLINES**

Noted for consideration: **April 9, 2018**

JOINT STIPULATION

The parties, by and through their counsel of record, hereby STIPULATE AND AGREE to an extension of the following pre-trial deadlines:

<u>Description</u>	Old Deadline	New Deadline
Rebuttal Expert Disclosures	May 4, 2018	May 30, 2018
Discovery Deadline	June 3, 2018	June 30, 2018

700 STEWART STREET, SUITE 5220 TLE, WASHINGTON 98101-1271 206-553-7970

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Although the parties began the process of discovery in July 2017, the parties are continuing to seek medical records from recently identified medical providers relevant to the issue of damages. The parties are also discussing a potential pretrial resolution, and the additional time will allow the parties to explore that possibility prior to incurring the costs of deposing the Plaintiff's and the United States' expert witnesses. Accordingly, the parties respectfully request an extension to May 30, 2018 to produce rebuttal expert reports, and June 30, 2018 to complete discovery. This extension will not effect the trial date scheduled for October 1, 2018.

DATED this 9th day of April, 2018.

NELSON, LANGER & ENGLE

s/Frederick P. Langer

Frederick P. Langer, WSBA#25932

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STIPULATION AND PROPOSED ORDER FOR EXTENSION OF PRE-TRIAL DEADLINES 17-CV-416RSL - 2

UNITED STATES ATTORNEY 700 STEWART STREET, SUITE 5226 SEATTLE, WASHINGTON 98101-1271 206-553-7970

ORDER

The parties having so stipulated and agreed, it is hereby **SO ORDERED**. The deadline for rebuttal expert reports is extended to May 30, 3018, and the discovery deadline is extended to June 30, 2018. The Clerk is directed to send copies of this Order to all counsel of record.

DATED this Ot day of April , 2018

JUDGE ROBERT S. LASNIK UNITED STATES DISTRICT COURT

STIPULATION AND PROPOSED ORDER FOR EXTENSION OF PRE-TRIAL DEADLINES 17-CV-416RSL - 3

UNITED STATES ATTORNEY 700 STEWART STREET, SUITE 5220 SEATTLE, WASHINGTON 98101-1271